

**FINAL  
STATEMENT OF LEGAL AND FACTUAL BASIS**

**American Furniture Company, Inc.**

Martinsville, Virginia

Permit Number. VA-30692

**Permit Date: December 28, 2001, amended June 18, 2002, amended April 21, 2005**

**Registration No. 30692**

**AFS ID No. 089-0064**

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, American Furniture Company, Inc. has applied for a modification to the Title V Operating Permit for its Martinsville facility.

*This permit modification is being issued to incorporate the following state NSR permits:*

- *December 21, 2004 (supercedes October 19, 2001) for Plant 8*
- *September 30, 2002 for the Flat Finishing Line*
- *March 29, 1991 amended August 30, 2001 for Fritz Press and opening press to specify state only conditions*

*Engineer/Permit Contact:*\_\_\_\_\_

*Date:*

*Air Permit Manager:*\_\_\_\_\_

*Date:*

***NOTE*** - language added to the original SOB is presented in *Italics*

## **FACILITY INFORMATION:**

### Permittee

American Furniture Company, Inc.  
P.O. Box 5071  
Martinsville VA 24115-5071

### Facility

American Furniture Company, Inc.  
Route 966  
Martinsville VA 24115

AFS ID No.: 51-089-0064

## **SOURCE DESCRIPTION**

SIC Code: 2511 - wood furniture manufacturing

## **FACILITY DESCRIPTION:**

American Furniture Company, Inc. is a manufacturer of furniture covered by Standard Industrial Classification (SIC) Code 2511. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The facility manufactures furniture from rough cut wood that is dried, milled, machined, sawed, sanded, assembled, finished and shipped. The facility is permitted to process 38,540,000 board feet of wood per year from its woodworking operation which supplies all of the wood used in the various departments of the facility.

The source manufactures furniture at its facility. It is a subsidiary of La-z-boy Furniture. Portions of the facility are covered by permit while other portions of the facility have never been permitted. Currently permitted emission units are a  $48.6 \times 10^6$  Btu/hr wood fired boiler (9/2/99 amended on June 14, 2002); two presses (3/29/91 amended 8/30/01); a tape face veneer spray booth, two sample spray booths, and a chair finishing line (7/11/91, amended 5/4/93, amended 2/10/00, amended 10/19/01); and the woodworking operations and dust collection systems (9/27/93, amended 11/10/93). Non-permitted emissions units include a  $13.6 \times 10^6$  Btu/hr wood fired boiler and the main furniture finishing operation.

*Current State NSR permits effective for this facility include:*

- *March 29, 1991 amended **August 30, 2001** for Fritz Press and Columbia-3 opening press;*
- *February 10, 2000 amended October 19, 2001 amended **December 21, 2004** for Plant 8 and Sample Plant finishing operations and a Tape Face Veneer spray booth;*
- *September 27, 1993 amended **November 10, 1993** for miscellaneous woodworking equipment;*
- *September 2, 1999 amended **June 14, 2002** for the Combustion Engineering boiler; and*
- ***September 30, 2002** for the Flat Finishing line*

Rough cut green hard wood is brought to the facility where it is dried in kilns. The steam for the kilns is supplied by the two facility boilers. Furniture components are made from the dry wood by milling, machining, sawing, and sanding. All of the wood dust is collected by the facility's dust collection systems. All emissions from the dust collection systems are controlled by fabric filters. The wood dust is used as fuel in the boilers. When not needed, the wood dust is stored in silos and/or a covered shed. The dust systems for the facility are permitted.

The presses are used to make laminated board, using veneers and adhesive, which is then used to make furniture components. The presses use low VOC adhesives and are permitted. Heat for the presses comes from a  $1.14 \times 10^6$  Btu/hr natural gas fired heater. Some furniture components have veneer applied using the tape face veneer spray booth to apply adhesive. The tape face veneer spray booth uses a water based adhesive and is permitted.

The furniture components are assembled prior to finishing using various adhesives, such as hot melt and white glue (similar to Elmer's) which contain little or no VOCs. The source manufactures some upholstered furniture. In the upholstery process some contact adhesives are used. The furniture assembly and upholstery adhesive VOC emissions are fugitive and are un-permitted.

A mostly *solvent*-based coating system is used by the *Plant 8* finishing line. This finishing line is permitted and contains 4 spray booths and 4 drying ovens. Heat for the dryers is supplied by steam from the facility boilers. Most of the furniture is finished by the main furniture operation, which *also* uses solvent-based finishes. The main finishing line is in Plant 7 and consists of 12 spray booths and 3 drying ovens. Heat for the ovens is supplied by steam from the facility boilers. Sample pieces of furniture are finished in the 2 sample plant spray booths.

Process and space heat for the facility are provided by two wood fired boilers, one manufactured by Combustion Engineering (CE) rated at  $48.6 \times 10^6$  Btu/hr and the other manufactured by Keeler rated at  $13.6 \times 10^6$  Btu/hr. The smaller boiler is used during warm weather and the large boiler is used during cold weather. The large boiler is permitted while the small boiler is un-permitted. Fuel for the large boiler is limited to 7,900 tons of wood. The source requested the approval to burn coal be removed from the Title V permit issued December 28, 2001 and the NSR permit issued September 2, 1999. The source has not burned coal in a long time and does not desire to burn coal.

### Compliance History

A review of inspection reports for the past 5 years show the source to be in compliance. There have been two Requests for Corrective Action issued during this time frame for minor fugitive wood dust emissions. Corrective action was quickly taken by the source in both instances.

The source received a permit to install a  $48.6 \times 10^6$  Btu/hr wood-fired boiler on October 29, 1987. This permit was superseded on September 2, 1999 to restrict wood fuel throughput. This permit was amended on June 14, 2002 to remove coal as an approved fuel.

On February 15, 1991 a permit was issued to the source for woodworking equipment and dust

handling system for a sample plant. This permit was superseded by a permit issued September 27, 1993, amended November 10, 1993, that covered all of the wood dust handling systems at the facility.

A permit was issued on March 29, 1991 to the source to install a Fritz press and a Columbia 3 opening press. The primary purpose of this permit was to limit VOC emissions in the form of formaldehyde. This permit was amended August 30, 2001 to create a state-only section to address toxics.

On July 11, 1991 a permit was issued to the source for the installation of a tape face veneer spray booth, two sample spray booths, and a chair finishing line, consisting of 4 spray booths and 3 drying ovens. The chair finishing line uses a hybrid water based finishing system, which does include some solvent coatings. This permit was amended May 4, 1993 to increase the VOC limits from the sample plant spray booths and to reduce the VOC limits from the chair line. The permit was superseded February 10, 2000 to allow an increase in annual VOC emissions from the sample plant. This permit was amended again on October 19, 2001 to create a state-only section.

### **EMISSIONS SUMMARY:**

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]		
CRITERIA POLLUTANTS	1999 ESTIMATED EMISSIONS	1998 ESTIMATED EMISSIONS
Particulate Matter (PM <sub>10</sub> )	13.5	20.8
Nitrogen Oxides (NO <sub>x</sub> )	8.4	9.9
Sulfur Dioxide (SO <sub>2</sub> )	0.7	0.5
Carbon Monoxide (CO)	18.2	44.5
Volatile Organic Compounds (VOC)	385.0	327.7
HAZARDOUS AIR POLLUTANTS		
Combined HAPs	>25	>25

### **TITLE V PROGRAM APPLICABILITY BASIS:**

This facility has the potential to emit greater than 100 tons per year of VOCs. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant and over 25 tons per year of HAPs, American Furniture Company, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 9 VAC 5 Chapter 80 Article 1.

### **Applicable Requirements**

#### Emissions Standards and Visible Emission Requirements

##### Fuel Burning Equipment (B01 & B02)

Emission limits for the CE boiler (B01) are contained in the source's NSR permit dated 9/2/99 and amended on June 14, 2002. PM, PM-10, Sulfur Dioxide, Nitrogen Oxides, Carbon Monoxide, and VOCs are regulated pollutants. Installation of the CE boiler at the facility was in 1987, therefore, it is not subject to NSPS Subpart Dc. Fuel for this boiler is restricted to kiln dried wood (8,000 Btu/lb).

The source requested the approval to burn coal be removed from the Title V permit issued December 28, 2001 and the NSR permit issued September 2, 1999.

This boiler has the potential to burn over 26,000 tons of dry wood per year. The NSR permit limits the fuel usage to 7,900 tons of wood per year. Wood usage has been less than 4,000 tons per year. The NSR permit requires that particulate emissions be controlled by two multicyclones in series, which gives a control efficiency of approximately 90%. Particulate limits in the permit are based on using a conservative control efficiency of approximately 75%. Records of the quantities of fuels used are required along with specifications of the fuels used. Maintenance, inspection, and operator training programs are required for the boiler and multicyclones to insure that they are operating properly. The emissions limits in this permit are carried over from the NSR permit and are based on the maximum hourly fuel burning capacity of the boiler, annual throughput limits, the higher heating value (HHV) of each fuel, and appropriate emission factors for each fuel converted to the HHV. With the fuel restrictions, required controls, required recordkeeping, required maintenance inspections, and conservative emissions limits it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Visible emissions for the CE boiler (B01) are limited to 20% opacity, except for one six-minute period per hour of 30% opacity. Under normal operations the opacity is 10% or less. Included in the NSR permit is the requirement that the source develop maintenance, inspection, and training programs to insure the proper operation of the boiler and multicyclones. Inspections of the multicyclones shall be annual at a minimum. Monitoring of opacity will require the source to at least one time per week observe for the presence of visible emissions from the CE boiler stack. If visible emissions are present, a visible emission evaluation (VEE) must be conducted in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes. If any of the observations exceed the opacity limitation of 20%, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the CE boiler resumes operation within the 20% opacity limit. The source must maintain a CE boiler stack observation log to demonstrate compliance. The log will include the date and time of any observations, whether or not there were visible emissions, the results of all VEEs, and any necessary corrective action.

Emission limits for the Keeler boiler (B02) are based on 9 VAC 5 Chapter 40 Article 8 (Rule 4-8). The Keeler boiler was installed in 1962 and is considered as existing equipment. PM, PM-10, and Sulfur Dioxide are regulated pollutants. Particulate emissions are controlled by one multicyclone. The particulate standard for this boiler uses the heat capacity ( $H=13.6$  MMBtu/hr) and the formula in 9 VAC 5-40-900 ( $E=1.0906 \cdot H^{0.2594}$ ) to calculate an emission limit of 0.554 lbs/MMBtu of heat input. Using a conservative particulate control efficiency of 60% and the same conservative emission factors as the Combustion Engineering boiler the particulate emissions when burning wood calculate to be 0.39 lbs/MMBtu, well below the regulated limit. Sulfur Dioxide emissions for the Keeler boiler are limited by 9 VAC 5-40-930 at 2.64 lbs/MMBtu. This boiler is only equipped to burn wood or coal. The source requested the approval to burn coal be removed from the Title V permit issued December 28, 2001. The source has not burned coal in a long time and does not desire to burn coal.

Kiln dried wood is the only fuel now used by the boiler. The dry wood fuel is stored in silos until used.

This boiler has the potential to burn over 7,400 tons of dry wood per year. However, the wood usage has been less than 4,000 tons per year. Records of the quantities of fuel used are required along with specifications for the fuel used. Maintenance, inspection, and operator training programs are required for the boiler and multicyclone to insure that they are operating properly. With the regulated emission standard, required controls, required recordkeeping, and required maintenance inspections it is felt that the margin of compliance is sufficient to assure compliance with the regulated standards.

Visible emissions for the Keeler boiler (B02) are limited to 20% opacity, except for one six-minute period per hour of 60% opacity. Under normal operations the opacity is 10% or less. Included in the Title V permit is the requirement that the source develop maintenance, inspection, and training programs to insure the proper operation of the boiler and multicyclone. Inspections of the multicyclone shall be annual at a minimum. Monitoring of opacity will require the source to at least one time per week observe for the presence of visible emissions from the Keeler boiler stack. If visible emissions are present, a visible emission evaluation (VEE) must be conducted in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes. If any of the observations exceed the opacity limitation of 20%, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the Keeler boiler resumes operation within the 20% opacity limit. The source must maintain a Keeler boiler stack observation log to demonstrate compliance. The log will include the date and time of any observations, whether or not there were visible emissions, the results of all VEEs, and any necessary corrective action.

EPA Region III will not let DEQ include in this Title V permit the state regulation relaxing (excluding) the opacity standards during periods of startup, shutdown, or malfunction for this existing pre-1972 boiler because it was recently realized that EPA specifically disapproved this DEQ regulation. However, EPA has SIP approved similar wording in 9 VAC 5-50-20 A.3 for emissions units that were new or modified after 1972.

Tables follow listing emission factors, permit emission limits and calculated potential emissions.

#### **Emission Calculations using Wood as Fuel**

<b>Keeler 13.6 x 10<sup>6</sup> boiler (B02)</b>	<b>Emission Factor (lbs/ton coal)</b>	<b>Potential (lbs/10<sup>6</sup> Btu)</b>	<b>Permit Limit (lbs/10<sup>6</sup> Btu)</b>
Particulate matter	12	0.34 lbs/10 <sup>6</sup> Btu	0.55 lbs/10 <sup>6</sup> Btu
PM-10	7.8	0.11 lbs/10 <sup>6</sup> Btu	0.55 lbs/10 <sup>6</sup> Btu
Sulfur Dioxide	38	0.005 lbs/10 <sup>6</sup> Btu	2.64 lbs/10 <sup>6</sup> Btu

#### Woodworking (W06)

Emission limits for the woodworking operation in the source's NSR permit dated 9/27/93, amended 11/10/93, are for TSP and PM-10 emissions. However, with TSP actually being an air quality

monitoring term and not a stack emission term, PM is being used in the Title V permit instead of TSP. PM and PM-10 are regulated pollutants. The NSR permit requires that particulate emissions from the woodworking operation be controlled by fabric filters. Several cyclones are used by the source, mostly as precleaners, but all are either in closed loops or discharge to a fabric filter. PM and PM-10 limits are based on the permitted annual wood throughput limit of 38,540,000 board feet and a particulate load of 0.01 gr/dscf. Emission statements indicate that usage at the facility is well below its board feet per year limit. The particulate loading of 0.01 gr/dscf is easily attained when controlled by cyclone precleaners and fabric filters that are operated properly and are below their capacity. With the throughput restrictions, required controls, required recordkeeping, required maintenance inspections, and conservative emissions limits it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Visible emissions from the fabric filters are limited to 5% opacity. Under normal operations there are no visible emissions. Any visible emissions would be because of a malfunction or poor operations and maintenance. Included in the NSR permit is the requirement that the source develop maintenance, inspection, spare parts, and training programs to insure the proper operation of the fabric filters. Inspections of the fabric filters shall be monthly at a minimum. Monitoring of opacity will require the source to at least one time per week observe for the presence of visible emissions from the fabric filters, log the observations, and take corrective action if emissions are present. With the low potential emissions, it is felt that these maintenance and operation procedures will assure compliance with the opacity standard.

#### Veneer Presses - Fritz and Columbia-3 Opening (V07)

Emission limits for the veneer presses in the 3/29/91 NSR permit amended 8/30/01 are for VOCs from the adhesive used, and the only VOC is formaldehyde, a HAP. The VOC limit in the NSR permit is because of Virginia's toxic regulations, which are not included in the State Implementation Plan (SIP). Therefore, these limits are considered as state-only requirements. HAP limits are based on the TLV data for each HAP. The NSR permit restricts the hours of operation of each press and limits VOC emissions (as formaldehyde) to less than 832 pounds per year. Maximum hourly capacity of the presses was used in determining hourly limits. Recordkeeping requirements in the NSR permit require the source to maintain records of the throughput of free formaldehyde for the presses. With the operational hours restrictions, required recordkeeping, and conservative emissions limits it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits. *These conditions have been included in the State Only section of this Title V permit amendment.*

Visible emissions from the presses are limited to 5% opacity by the source's NSR permit. A  $1.14 \times 10^6$  Btu/hr natural gas fired oil heater is used to provide heat to the presses. This heater is considered an insignificant emissions unit. Under normal operations there are no visible emissions. To monitor opacity this permit will have the source, at least weekly, observe for any visible emissions, log the observation, and take corrective action if emissions are present. With the low potential emissions, it is felt that the monitoring will assure compliance with the opacity standard.

#### Tape Face Veneer (TV03)

Emissions limits for the tape face veneer spray booth operation in the source's NSR permit dated



7/11/91, amended 10/19/01, *amended 12/21/04* are for formaldehyde, a VOC and HAP. PM emissions are controlled by booth filters and are less than 0.5 tons per year. Both PM and VOCs are regulated pollutants. *The State-only conditions pertaining to formaldehyde emissions which were included in the NSR amendment dated 10/19/01 were deleted from the 12/21/04 amendment since the Tape Face Veneer spray booth operation is covered under MACT JJ. Since there is an applicable MACT for this process, State Toxics regulations do not apply.*

Visible emissions from the spray booth are limited to 5% opacity by the source's NSR permit. Included in the NSR permit is the requirement that the source develop maintenance, spare parts, and training programs to insure the proper operation of the spray booth. To monitor opacity this permit will have the source, at least weekly, observe for any visible emissions, log the observation, and take corrective action if emissions are present. With the low potential emissions, it is felt that the monitoring will assure compliance with the opacity standard.

#### Sample Plant Finishing (S04)

Emission limits for the sample plant spray booths operation in the source's NSR permit dated 7/11/91, amended 10/19/01, *amended 12/21/04* are for VOCs. PM emissions are controlled by booth filters and are less than 0.5 tons per year. Both PM and VOCs are regulated pollutants. Maximum hourly capacity of the finishing booths was used in determining hourly limits. Recordkeeping requirements in the NSR permit require the source to maintain records of VOC usage and monthly calculations of VOC emissions. With the required controls, required recordkeeping, required maintenance inspections, and conservative emissions limits it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Visible emissions from the spray booths are limited to 5% opacity by the source's NSR permit dated 7/11/91, amended 10/19/01, *amended 12/21/04*. Included in the NSR permit is the requirement that the source develop maintenance, spare parts, and training programs to insure the proper operation of the spray booth. To monitor opacity this permit will have the source, at least weekly, observe for any visible emissions, log the observation, and take corrective action if emissions are present. With the low potential emissions, it is felt that the monitoring will assure compliance with the opacity standard.

#### Plant 8 Finishing Line (C05)

Emission limits for the *Plant 8* finishing line operation in the source's NSR permit dated 7/11/91, amended 10/19/01, *amended 12/21/04* are for VOCs. PM emissions are controlled by booth filters and are less than 0.5 tons per year. Both PM and VOCs are regulated pollutants. Maximum hourly capacity of the finishing line was used in determining hourly limits. Recordkeeping requirements in the NSR permit require the source to maintain records of VOC usage and monthly calculations of VOC emissions. With the required controls, required recordkeeping, required maintenance inspections, and conservative emissions limits it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Visible emissions from the spray booths are limited to 5% opacity by the source's NSR permit dated 7/11/91, amended 5/4/93, *amended 12/21/04*. Included in the NSR permit is the requirement that the source develop maintenance, spare parts, and training programs to insure the proper operation of the



spray booths. To monitor opacity this permit will have the source, at least weekly, observe for any visible emissions, log the observation, and take corrective action if emissions are present. With the low potential emissions, it is felt that the monitoring will assure compliance with the opacity standard.

#### Plant 7 Finishing Room (FG09)

Emissions from the finishing room spray booths are PM and VOCs. This portion of the facility is existing equipment and is not covered by a NSR permit. The source has booth filters on all its spray booths.

Visible emissions from the finishing room spray booths are limited to 20% opacity, except for one six-minute period per hour of 60% opacity, by 9 VAC 5-40-80. In order to assure compliance the Title V permit requires the source to develop maintenance, spare parts, and training programs to insure the proper operation of the spray booths. To monitor opacity this permit will have the source, at least weekly, observe for any visible emissions, log the observation, and take corrective action if emissions are present. It is felt that the monitoring will assure compliance with the opacity standard.

#### MACT requirements

Because this source has the potential to emit greater than 10 tons/yr of any single HAP and/or 25 tons/yr of any combination of HAPs it is subject to the MACT for furniture finishing. The source emitted greater than 50 tons of HAPs in 1996, therefore, its compliance date for the MACT was November 21, 1997. The source intends to use compliant coatings to meet the emission standards required by the MACT, however, the averaging method of compliance is still available to the source should it be needed. As the source does not intend to use a control device to meet the emission standards, those portions of the MACT requirements dealing with control devices have not been included in this Title V permit. The source has submitted its initial compliance certification and its required continuous certifications to date.

#### Generally Applicable Requirements

Visible emissions from any emissions unit not specifically listed can not exceed 20% opacity except for one six-minute period in any hour of not more than 30%. This is in accordance with 9 VAC 5-50-80.

#### State-only Requirements

The state-only requirements associated with this facility deal with Virginia's toxics regulations. *State-Only conditions are included in this permit modification for the Fritz press and the Columbia-3 opening press. The Virginia toxics regulation is applicable to this equipment since MACT JJ is not applicable. State-only conditions for this equipment were included in the amended NSR permit dated August 30, 2001.*

### **LEGAL AND FACTUAL BASIS FOR PERMIT CONDITIONS:**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the Commonwealth of Virginia Federal Operating Permit Regulations for the purposes of Title V of the Federal Clean Air Act (9 VAC 5 Chapter 80 Article 1), and underlying applicable requirements in other state and federal rules. Applicable requirement means all of the following as they

apply to emission units in a Title V source:

- a. Any standard or other requirement provided for in the State Implementation Plan or the Federal Implementation Plan, including any source-specific provisions such as consent agreements or orders.
- b. Any term or condition of any preconstruction permit issued pursuant to 9 VAC 5-80-10, Article 8 (9 VAC 5-80-1700 et seq.) of this part or 9 VAC 5-80-30 or of any operating permit issued pursuant to 9 VAC 5 Chapter 80 Article 5, except for terms or conditions derived from applicable state requirements or from any requirement of these regulations not included in the definition of applicable requirement.
- c. Any standard or other requirement prescribed under these regulations, particularly the provisions of 9 VAC 5 Chapter 40 (9 VAC 5-40-10 et seq.), 9 VAC 5 Chapter 50 (9 VAC 5-50-10 et seq.) or 9 VAC 5 Chapter 60 (9 VAC 5-60-10 et seq.), adopted pursuant to requirements of the federal Clean Air Act or under §111, 112 or 129 of the federal Clean Air Act.
- d. Any requirement concerning accident prevention under §112(r)(7) of the federal Clean Air Act.
- e. Any compliance monitoring requirements established pursuant to either §504(b) or §114(a)(3) of the federal Clean Air Act or these regulations.
- f. Any standard or other requirement for consumer and commercial products under §183(e) of the federal Clean Air Act.
- g. Any standard or other requirement for tank vessels under §183(f) of the federal Clean Air Act.
- h. Any standard or other requirement in 40 CFR Part 55 to control air pollution from outer continental shelf sources.
- i. Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the federal Clean Air Act, unless the administrator has determined that such requirements need not be contained in a permit issued under this article.
- j. With regard to temporary sources subject to 9 VAC 5-80-130, (i) any ambient air quality standard, except applicable state requirements, and (ii) requirements regarding increments or visibility as provided in Article 8 (9 VAC 5-80-1700 et seq.) of this part.
- k. Any standard or other requirement of the acid deposition control program under Title IV of the Clean Air Act or the regulations promulgated thereunder.
- l. Any standard or other requirement governing solid waste incineration under §129 of the Clean Air Act.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 9 VAC 5 Chapter 80 Article 1 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the state but is not federally-enforceable is identified in the Title V permit as such.

#### **REQUEST FOR VARIANCES OR ALTERNATIVES:**

None

#### **COMMENT PERIOD:**

The *original* public notice appeared in the Martinsville BULLETIN on September 3, 1999.

Beginning Date: September 3, 1999

Ending Date: October 3, 1999

Comments were only received from the Environmental Protection Agency.

*The draft/proposed permit modification was placed on public notice in the Martinsville Bulletin on February 16, 2005. The required 30-day notice period ended on March 18, 2005. This permit was advertised for concurrent review as a draft/proposed permit. EPA's review period ended on April 4, 2005. No comments were received from either the public or EPA during the public notice and review period.*